

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

**CHMURA ECONOMICS &
ANALYTICS, LLC,**

**Plaintiff/Counterclaim
Defendant,**

Case No. 3:19-cv-813-REP

V.

RICHARD LOMBARDO,

**Defendant/Counterclaim
Plaintiff.**

**PLAINTIFF AND COUNTERCLAIM DEFENDANT’S MOTION *IN LIMINE* TO
PRECLUDE EVIDENCE, QUESTIONING, OR ARGUMENT CONCERNING ANY
SUBSEQUENT RECLASSIFICATION OF ITS ACCOUNT MANAGERS**

Plaintiff and Counterclaim Defendant Chmura Economics & Analytics, LLC (“Chmura” or “Plaintiff”), by counsel and pursuant to Fed. R. Evid. 401, 403, and 407, files this Motion *in Limine* to Preclude Evidence, Questioning, or Argument Concerning Any Subsequent Reclassification of Its Account Managers. For the reasons discussed in the accompanying Memorandum of Law, Chmura respectfully requests that the Court preclude Defendant and Counterclaim Plaintiff Richard Lombardo (“Lombardo” or “Defendant”) from introducing or attempting to introduce any evidence, questioning, or argument concerning Chmura’s reclassification of some of its Account Managers as non-exempt under the Fair Labor Standards Act after the termination of Lombardo’s Chmura employment and his filing of this lawsuit.

Dated: May 21, 2020

/s/

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CERTIFICATE OF SERVICE

I hereby certify that on the 21st day of May, 2020, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System, which will send a notification of such filing (NEF) to all counsel of record.

/s/

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